Motion GRANTED. Extension to 3/30/2015.

## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	
V.	)	No. 3:13-00119-2
	)	JUDGE TRAUGER
WILLIAM M. WORTHY II (2), et al	)	

## MOTION TO EXTEND DEADLINE FOR FILING NEW SPEEDY TRIAL WAIVER AND TO ALLOW LATE FILING OF SPEEDY TRIAL WAIVER

Undersigned counsel William J. Steed III, on behalf of Defendant (2), William M. Worthy II, respectfully moves this Honorable Court to extend the time within which to file a new Waiver of Speedy Trial, to Monday, March 30, 2015, one week from today, and to permit late filing. Counsel is in communication with his client at the Bureau of Prisons, and counsel has sent a new Speedy Trial Waiver. Logistical issues have simply caused a delay in the Waiver being delivered to Mr. Worthy, and then in the signed copy being sent back to counsel. In support of this extension, counsel notes several key points.

- (1) Mr. Worthy filed a Speedy Trial Waiver on January 12, 2015, as to the most recent continuance of a trial setting (Docket No. 127). Mr. Worthy thus agreed in writing to the last continuance of a trial date. At the status conference on March 2, 2015, the Court advised it would prefer new Speedy Trial Waivers, in light of the parties' suggestion that a new status conference be set in June 2015, in lieu of a new trial date (Docket No. 130). The Court issued a formal Order the following day, March 3, 2015, requiring all defendants to file new waivers by March 9, 2015 (Docket No. 132).
- (2) Counsel was unable to meet that March 9, 2015 deadline, due to Mr. Worthy being incarcerated at the Bureau of Prisons in South Carolina. Counsel thus moved the